

From: Paola Roman [<mailto:proman@carrfour.org>]

Sent: Wednesday, February 21, 2018 12:02 PM

To: Marisa Button <Marisa.Button@floridahousing.org>

Cc: Stephanie Berman <sberman@carrfour.org>

Subject: Comments to RFA 2018-108 For Persons with Disabling Conditions or Persons with Developmental Disabilities

Dear Ms. Button,

Thank you for hosting the workshops for participation via phone; it saves us travel time and cost and allows us to invite other not for profit partners to listen in.

We are extremely grateful that this special needs RFA was made eligible only to not for profit applicants and urge you to keep it this way. It is important to remember that there are very few funding rounds where not-for-profits can compete on an even playing field with for-profits given the number of applications that for-profits submit. By limiting some of the special needs RFAs to mission driven not-for-profit applicants, you are evening the playing field so that not-for-profits have a chance to get some deals done, strengthen their capacity and reinvest their fee into developing more supportive housing. There is no policy reason to justify broadening this requirement so that for-profit developers can apply. Mission driven not-for-profit organizations bring a unique expertise to supportive housing developments and typically serve the most vulnerable residents without imposing barriers often imposed by for-profit developers. Not-for-profits who lack capacity can always partner with other not-for-profit organizations that have capacity.

We also need to reemphasize the importance of decreasing the special needs population from 70% to 50%. This is not only the best from an operational stand point, but also ideal from a social/community perspective as the development would be less institutional. Carrfour owns and operates buildings with all mixes: 100% PSH, 80% PSH with 20% affordable units, 70% PSH with 30% affordable units and developments that are 50% PSH and 50% affordable housing. It is our experience that communities with the 50/50 mix are the healthiest- both for the economic health of the building and the health/well-being of our residents. Furthermore, while we understand wanting to get the best "bang for your buck", we do not believe that increasing the percentages in special needs developments is the right approach. Another approach to get more supportive housing units is to incentivize developers to add supportive housing units to their affordable developments in non-special needs rounds.

Lastly, please consider extending the deadline for the applications as the current projected timeline is very compressed. Some municipalities throughout the State have complicated site plan approval processes which cannot be completed in less than a month. As we work together to bring supportive housing into new communities, it is important to consider that many local governments have never seen the FHFC forms and many have review/hearing processes that cannot be completed in less than 30 days. While some of this work can be done before the RFA is issued, it is difficult to submit the final requests to the municipalities to start their review process when there is still uncertainty regarding some of the RFA parameters. For example, if the percentages change to allow for more non-supportive housing units, we would want to change the unit breakdown to have less one-bedrooms and more 2 and 3 bedrooms which would change the submittal to the municipalities. It is difficult to finalize the site plan and submit for review/hearing prior to the final RFA being issues.

Thank you for your consideration.

Sincerely,
Paola

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